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**From:** Bacey, Juanita@DTSC [Juanita.Bacey@dtsc.ca.gov]  
**Sent:** 10/25/2017 9:53:23 PM  
**To:** LEE, LILY [LEE.LILY@EPA.GOV]  
**Subject:** RE: FYI - EPA draft review of Parcel G Trench Units in draft Radiological Data Evaluation Findings Report

Oh Sorry Lily. I filled her in last Thursday too.

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**From:** LEE, LILY [mailto:LEE.LILY@EPA.GOV]  
**Sent:** Wednesday, October 25, 2017 2:34 PM  
**To:** Ures, Tina@Waterboards <Tina.Ures@Waterboards.ca.gov>  
**Cc:** Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>  
**Subject:** FYI - EPA draft review of Parcel G Trench Units in draft Radiological Data Evaluation Findings Report

Dear Tina,

I'm sorry I haven't filled you in earlier. Please call me if you want to talk more. And I'm sure Nina can also fill you in tomorrow when you are doing the site visit too.

FYI - Last week, EPA and state DTSC sent comments on Parcel G of the Navy's radiological data evaluation of Tetra Tech EC, Inc., former work at Hunters Point Naval Shipyard. Parcel G is the next one the City wants to redevelop. It has a known history of previous radiological contamination. Much of the work in this parcel occurred during years that former workers alleged wrongdoing. The Navy reviewed available data, found evidence of potential falsification and proposed resampling in nearly half of the trench, building site, and fill units. Regulatory agencies reviewed the draft findings and found more areas of concern and recommended most of the remaining half for resampling in addition for a total of 97% of trench, fill, and building site units recommended for resampling (see attached summary spreadsheet). We also sent the Navy and City the attached detailed spreadsheet of EPA's analysis and justification for technical recommendations.

We will continue technical review of evidence from other Parcels. They each have unique circumstances and may have greater or lesser degree of associated concern.

Attached is the narrative of EPA comments. Below is an excerpt.

"Together, the EPA and the Navy found enough concerns to recommend resampling in 94% of trench units in Parcel G. The data analyzed demonstrate a widespread pattern of practices that appeared to show potential deliberate falsification, potential failure to perform the work required to ensure ROD requirements were met, or both. The data revealed not only potential purposeful falsification and fraud in terms of sample and/or data manipulation, they also reveal the potential failure to conduct adequate scans, a lack of proper chain of custody for ensuring samples were not tampered with, extensive data quality issues (including off-site laboratory data) and general mis-management of the entire characterization and cleanup project."

"These observations in the record call into question the performance of Tetra Tech EC, Inc., across all of Parcel G. Many of the same personnel in Tetra Tech EC, Inc., worked in a similar time period at nearby locations in Parcel G. The pervasiveness and magnitude of the documented wrongdoing makes it difficult to conclude that similar falsification did not also occur at the four out of 63 trench units where evidence of wrongdoing was not as apparent. Therefore, none of the data generated while Tetra Tech EC, Inc., was involved with the cleanup activities at Parcel G, can be deemed to be definitive or defensible. Therefore, the extent of the problems found in Tetra Tech EC, Inc., work and the history of contamination confirmed in Parcel G (see examples listed in the cover letter) make comprehensive rework for characterization, and potential additional cleanup, necessary to demonstrate in the record that ROD requirements have been met.

Forwarded:

Dear Pat,

Thank you for providing for review the *Draft Radiological Data Evaluation Findings Report for Parcels B and G Soil* ("Report"), Former Hunter's Point Naval Shipyard, September 2017. I appreciate it represents a great deal of hard work in a short time by a credentialed team. The Navy has requested an expedited review of the Report. In response to the Navy's request for updates on review progress in stages, EPA is providing the following interim draft review comments in advance of a full review:

1. Cover Letter
2. Draft narrative comments on the Report's main text and describing EPA's reviews of the Navy's draft forms and data.
3. Spreadsheet for Parcel G Trench Unit giving detailed EPA review findings. The second tab shows an overall summary of scores.
4. Spreadsheet for Parcel G Building site survey units giving detailed CDPH and EPA review findings
5. Supplemental statistical analyses for individual trench units

Please contact me at 415-947-4187 or [lily.lily@epa.gov](mailto:lily.lily@epa.gov) if you would like to discuss any of these interim draft comments.

Lily Lee

Cleanup Project Manager

Superfund Division

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For information on Superfund in general: [www.epa.gov/region9/superfund](http://www.epa.gov/region9/superfund)

For information on Hunters Point Naval Shipyard: [www.epa.gov/superfund/hunterspoint](http://www.epa.gov/superfund/hunterspoint)